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10 FACEBOOK, INC. and MARK ZUCKERBERG

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13  
14 SAN JOSE DIVISION

15 FACEBOOK, INC. and MARK  
16 ZUCKERBERG,

17 Plaintiffs,

18 v.

19 CONNECTU, INC. (formerly known as  
20 CONNECTU, LLC), PACIFIC  
NORTHWEST SOFTWARE, INC.,  
21 WINSTON WILLIAMS, WAYNE CHANG  
AND DOES 1-25,

22 Defendants.

Case No. 5:07-CV-01389-RS

**PLAINTIFFS' MOTION TO SEAL  
EXHIBITS B-D TO THE  
DECLARATION OF YVONNE  
GREER SUBMITTING  
SUPPLEMENTAL EVIDENCE IN  
SUPPORT OF PLAINTIFFS'  
MOTION FOR PARTIAL SUMMARY  
JUDGMENT [DOC. 251] AND  
MOTION TO COMPEL  
COMPLIANCE BY PACIFIC  
NORTHWEST SOFTWARE AND  
WINSTON WILLIAMS [DOC. 271]**

23 Date: February 27, 2008  
24 Time: 9:30 A.M.  
Judge: Honorable Richard Seeborg

1 Pursuant to Civil L.R. 7-11 and 79-5 (d), Plaintiffs respectfully submit this motion asking  
2 the Court to file under seal Exhibits B-D to the Declaration of Yvonne Greer Submitting  
3 Supplemental Evidence In Support of Plaintiffs' Motion For Partial Summary Judgment [Doc.  
4 251] and Motion To Compel Compliance By Defendants Pacific Northwest Software And  
5 Winston Williams [Doc. 271] ("Greer Declaration").

6 The parties entered into, and the California Superior Court issued, a Stipulated Protective  
7 Order on January 23, 2006<sup>1</sup>, which prohibits either party from filing in the public record any  
8 documents that have been designated as "Confidential" or "Highly Confidential" pursuant to the  
9 Protective Order.

10 **Exhibits B-D** to the Greer Declaration are true and correct copies of documents produced  
11 to Plaintiffs by Pacific Northwest Software in this action in response to a Rule 34 Request for  
12 Production of Documents, bearing production numbers PNS0598676-78, PNS0600661-63, and  
13 PNS0602084-86. These documents were designated "Confidential" by Pacific Northwest  
14 Software pursuant to the Protective Order entered in this matter, and hence are subject to Local  
15 Civil Rule 79-5(d). Facebook takes no position regarding the propriety of the confidentiality  
16 designation of these documents.

17  
18  
19 Dated: February 22, 2008

Orrick, Herrington & Sutcliffe LLP

20 /s/ Yvonne P. Greer /s/

21 Yvonne P. Greer

22 Attorneys for Plaintiffs

FACEBOOK, INC. AND MARK ZUCKERBERG

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28 <sup>1</sup> The parties are in the process of drafting a new Stipulated Protective Order pursuant to this Court's instructions at  
the January 16, 2008 Case Management Conference.

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/s/ Yvonne P. Greer /s/  
Yvonne P. Greer